



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

ZACHARY KALMBACH
Assistant Corporation Counsel
phone: (212) 356-2322
fax: (212) 356-3509
zkalmbac@law.nyc.gov

January 19, 2023

VIA ECF

District Judge Jennifer L. Rochan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carol Lopez v. City of New York, et al.,
20 Civ. 2502 (JLR)

Your Honor:

I represent defendants City of New York, Anthony Saline, William Gonzalez, Crystal Dones, and Steven Torres in the above-referenced matter. Defendants write to respectfully request that the Court endorse the enclosed Stipulation and Order Concerning Protocol for Conducting Remote Depositions, which has been agreed to and executed by the parties.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Zachary Kalmbach
Zachary Kalmbach
Assistant Corporation Counsel
Special Federal Litigation Division

Encl.

cc: **Via ECF**
J. Remy Green, Esq.
Jessica Massimi, Esq.
Cohen & Green, P.L.L.C.
Attorneys for plaintiff